DOCUMENT RESUME

ED 084 380 CE 000 531

| | |
|---|---|
| TITLE | Training for Federal Quality Control Review. Instructor's Guide. |
| INSTITUTION | Social and Rehabilitation Service (DHEW), Washington, D.C. Office of Quality Control Management. |
| REPORT NO | SRS-74-04008 |
| PUB DATE | Jul 73 |
| NOTE | 49p.; For related manual see CE 000 532 |
| EDRS PRICE | MF-$0.65 HC-$3.29 |
| DESCRIPTORS | Evaluation Methods; Federal Programs; Governmental Structure; Government Employees; *Program Guides; *Quality Control; *Review (Reexamination); Service Workers; *Social Services; Task Performance; *Teaching Guides; Training Objectives; *Training Techniques |
| IDENTIFIERS | *Federal Quality Control Reviewer |

ABSTRACT

The instructor's guide is a companion document to the training manual, Training for Federal Quality Control Review. It is designed to aid regional training personnel in teaching the contents of the training manual to Federal Quality Control re-reviewers. This guide may also be used to train State staff in the quality control system and review process. The chapters outline job orientation, public assistance, State quality control system, and Federal monitoring. The main body of the guide presents segments of quality control training in three corresponding columns under the headings of topic, resource materials, and methodology. The appendix includes additional resource materials for the instructor. (KP)

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# TRAINING for FEDERAL QUALITY CONTROL REVIEW

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# INSTRUCTOR'S GUIDE

ED 084380

# TRAINING for FEDERAL QUALITY CONTROL REVIEW

# INSTRUCTOR'S GUIDE

U.S. DEPARTMENT OF
HEALTH, EDUCATION, AND WELFARE

Social and Rehabilitation Service

Office of Quality Control Management

SRS—74—04008 ● July 1973.

PREFACE

This Instructor's Guide to the manual Training for Federal Quality Control Review has been developed as an aid to SRS Regional Office Quality Control personnel whose responsibility it becomes to teach the elements of the review process to new Federal Quality Control Reviewers. As such, it is adaptable for use not only by those Regional reviewers who would update their skills and knowledge in the process according to the latest regulations but also by State reviewers whose process is akin to that of the Regional reviewer and who should benefit from knowledge of what the Regional reviewer is expected to re-review.

The Guide has been developed by the Training Staff of the SRS Central Office staff of the Office of Quality Control Management. Through input from Regional training staff, conferences with experts in the field of quality control management, and diligent search of existing materials, Mrs. Alicia Coro and John Kelly led the production efforts of others who contributed to the information herein. Much reliance was placed on the aid of John Schrott of the Quality Control Operations staff and Richard Bistritz of the Assistance Payments Administration. In addition, appreciation is extended to Miss Willene A. DeMond of the Region II Training Staff through whose contact the New York State Department of Social Services graciously made available for reference throughout the Guide the relevant modules of the sound/slides, Eligibility Review Training Program.

It is anticipated that this Instructor's Guide will become a vital part of the Quality Control training effort; consequently, suggestions are solicited for additions and revisions from those agencies and staff who use the document. Comments and queries may be directed to the Regional Office Training Specialist in Quality Control or to the Central Office Director of Training.

Elizabeth W. Stone

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# INTRODUCTION

This Instructor's Guide is a companion document to the Federal Quality Control training manual, Training for Federal Quality Control Review. Consequently, it is designed to aid regional training personnel in teaching the contents of Training for Federal Quality Control Review to Federal Quality Control re-reviewers. With appropriate adaptations, this guide may be used by trainers who train State staff in the State Quality Control system and review process.

A comparative glance at the table of contents in both documents will show that the sequence of Quality Control training covered in both documents is substantially the same. It is assumed, of course, that the trainer who uses the Instructor's Guide will have a copy of Training for Federal Quality Control Review.

For the instructor's convenience, an outline of the five main sections of Quality Control training (I. Job Orientation, II. Public Assistance, III. State Quality Control System, IV. Summation of the State Quality Control Process and Introduction to Federal Monitoring, V. Federal Monitoring) is located immediately following this introduction. The five section headings are considered to be the essential topics for training. The topics are developed in detail and constitute independent units of instruction.

The main body of the text presents segments of the Quality Control training in three corresponding columns under the headings of "Topic, Resource Materials, and Methodology." The topics are the same as those presented in the outline. There are four principal resource materials: (1) Training for Federal Quality Control Review; (2) Quality Control Manual, which is under revision and will be available in September, 1973; (3) Federal Quality Control Monitoring Guide; and (4) the relevant modules of the sound/slides, Eligibility Review Training Program. Additional resource material is furnished in the Appendix.

In the Methodology column the recommendations are merely suggestive. The individual instructor is expected to adapt training methods to his own particular style and circumstances. He alone can be expected to know best how to tailor Quality Control training to the varying realities

of the specific trainee(s), trainer(s), and the current Quality Control System.

The instructor must determine what the particular instructional situation calls for at any given point. It may require acquisition of new information, synthesis of information already acquired or putting the information into practice. Thoughtful, realistic decisions concerning such acquisition, synthesis and practice are the main key to sound selection of methods and media for training.

For example, training in the contents of Section III, "State Quality Control System," requires mostly acquisition of information until the final segment, "Application of Review Theory." But in this final segment the training is almost exclusively a matter of practice. How much information should be imparted and how much practice should be provided depend, of course, upon the background and previous experience of the trainees.

Again, the situation is quite different in training people in "Field Review" (Section V. B. 2. c.). Here the primary need is for the trainee to digest and synthesize the information bit by bit and put it into practice almost immediately.

Beyond the practical consideration of time, cost, availability and convenience, the method/media mix should be selected on the basis of its capacity to achieve some or all of the following goals: (1) to stimulate the learning process, (2) to reinforce the material, (3) to provide instructional variety, (4) to encourage participation in the learning experience - i.e., allow the trainee to interact with the instructor, the material and the other trainees.

Each trainer should develop his own appropriate exercises to complement the methods/media suggested in the Instructor's Guide. In addition to using his own ingenuity and experience, he should seek the assistance of other Quality Control personnel in designing effective learning constructs and encounters.

With reference to the use of transparencies suggested as resource materials under Topic III, B; Topic IV; and Topic V, B, 1, the guide indicates pages of the Training for Federal Quality Control Review, and the Federal Quality Control Monitoring Guide where charts which are to be reproduced are located. Instructors are expected to make use of their own facilities for vugraph reproduction. Trainers will find that the reproduction and use of transparencies to facilitate their presentation will be immeasurable in the result of understanding of the Quality Control review process by the trainees.

Finally, the trainer is responsible for the trainee's basic orientation to Quality Control - its importance, purpose and goals. He must see that the trainee has a thorough understanding of the main thrust of Quality Control - i.e., to help States better manage the AFDC program. Above all, the trainer will stress how the program must be administered with due respect for the rights of the people whom it serves.

OUTLINE

I. Job orientation
   A. Role and function
   B. Responsibilities
   C. Agency and individual expectations

II. Public Assistance
   A. Historical background
   B. Current Public Assistance Programs
      1. Social Security Act
      2. Code of Federal Regulations
      3. State Plans
      4. State Manuals
   C. Case Record
      1. Purpose
      2. Contents
      3. Example

III. State Quality Control System
   A. Historical background
   B. Current QC System
   C. QC Manual
      1. Scope and objectives
      2. Review Process
      3. Reporting and Sampling
      4. Corrective Action

D. Introduction to the State QC Review Process

1. Documents

a. QC Worksheet (Form 341A)

b. QC Schedule (Form 341B)

2. Elements

3. Eligibility Requirements

4. Verifications

E. Application of review theory

IV. Summation of the State QC Review Process and introduction to Federal Monitoring

V. Federal Monitoring

A. Assessment of the total State QC System

1. Organization, administration, staffing

2. Training

3. Sampling

4. Completed State QC Case Reviews

5. Reporting and analysis of statistical data

6. Corrective Action

B. Federal Re-review Monitoring

1. Roles and functions

a. Associate Regional Commissioner for Management

b. Regional Coordinator

c. Research Analyst

d. Training Specialist

e. Monitor

f. Reviewer

2. Process

a. Sample selection

(1) Re-review sample

(2) Non-sample cases

b. Initial Desk Review

c. Field Review

(1) Eligibility Requirements

(2) Federal Monitoring Schedule

(3) Verifications

(4) Interviewing

d. Final Desk Review

e. Disposition and Resolution of Findings

f. Reporting

# I. JOB ORIENTATION

TRAINING OBJECTIVE

To develop an awareness on the part of the trainee of the role, function, responsibilities and overall expectations involved in the Quality Control Review Process.

| TOPIC | RESOURCE MATERIALS | METHODOLOGY |
|---|---|---|
| I. JOB ORIENTATION | | |
| A. Role and function | Training for Federal Quality Control Review, Introduction, pp. 3 - 5; Section I, pp. 9-14; Section VI, pp. 47-56; Section VIII, pp. 83-89; Section X, pp. 139-142. | Lecture and discussion |
| F. Responsibilities | HEW Standards of Conduct (Form HEW-539, 9/70); Appendix A, "SRS Program Regulation 10-11 (C-6)"; Appendix B, "Do's and Don't's for Reviewers." | Discussion |
| C. Agency and individual expectations | Eligibility Review Training Program, New York State Department of Social Services, II. "Your Job." | Audio visual aids and discussion |

# II. PUBLIC ASSISTANCE

TRAINING OBJECTIVE

To provide the trainee with an understanding of Public Assistance Programs.

A. Historical Background: To provide a brief summary of events leading to the enactment of the Social Security Act.

B. Current Public Assistance Programs: To develop an understanding of:
(1) the Social Security Act as the enabling legislation providing the legal basis for the operation of the Public Assistance programs;
(2) the Code of Federal Regulations which specifies the requirements to be incorporated in an acceptable State plan;
(3) the State plan as the contractual agreement of the State to operate its program in accordance with Federal Regulations; and
(4) the State manual as the operational tool used by the eligibility worker to implement the provisions of the State plan.

C. Case Record: To introduce the reviewer to a typical case record - its purpose, contents and utilization, as a financial record to support the client's eligibility for an assistance grant.

| TOPIC | RESOURCE MATERIALS | METHODOLOGY |
|---|---|---|
| II. PUBLIC ASSISTANCE | | |
| A. Historical background | Perspectives in Public Welfare - A History, DHEW/SRS, 1969. | Lecture and discussion |
| | Eligibility Review Training Program, New York State Department of Social Services, I. "Meeting Changing Needs Through Assistance Payments and Services." | Audio visual aids and discussion |
| B. Current Public Assistance Programs | | |
| 1. Social Security Act | Compilation of the Social Security Laws, Title IV-A, (Vol. I). | Lecture on selected illustrations |
| 2. Code of Federal Regulations | Code of Federal Regulations, Title 45, Chapter II (illustrations of mandatory provisions and optional provisions); Appendix C, "Federal Regulations in Public Assistance." | Lecture on selected illustrations |

| TOPIC | RESOURCE MATERIALS | METHODOLOGY |
|---|---|---|
| 3. State Plans | Training for Federal Quality Control Review, Section III, pp. 23-27; Appendix D, "Preprint Illustrating a State Plan Agreement"; Eligibility Review Training Program, New York Department of Social Services, III. "Aid to Dependent Children." | Lecture with audio visual aids |
| 4. State Manuals | A State manual from a particular State within the Region. | Demonstration using appropriate State manual |
| C. Case Record | A case record from a local agency. | Discussion of the case record emphasizing the relevant financial factors |
| 1. Purpose | | |
| 2. Contents | | |
| 3. Example | | |

## III. STATE QUALITY CONTROL SYSTEM

TRAINING OBJECTIVE

To provide the trainee with a knowledge of the State QC system, its components and the tools used in conducting the QC review.

A. Historical Background: To trace the historical development of the present QC system.

B. Current Quality Control System: To explain the current QC system, its components and their inter-relationship.

C. Quality Control Manual: To provide a working knowledge of the QC manual.

D. Introduction to State QC Review Process: To develop an understanding of:
   (1) the QC review documents - their purpose, contents and usage,
   (2) the elements subject to review,
   (3) the eligibility requirements which pertain to the individual elements, and
   (4) the types of verification necessary to validate the elements.

E. Application of Review Theory: To provide practical application of the review theory.

| TOPIC | RESOURCE MATERIALS | METHODOLOGY |
|---|---|---|
| III. STATE QC SYSTEM | | |
| A. Historical background | Training for Federal Quality Control Review, Section II, pp. 17-20. | Explanation |
| B. Current QC System | Training for Federal Quality Control Review, Section IV, pp. 31-38; transparencies reproducing flowcharts: (1) "Components of the QC System", p. 33; (2) "Public Assistance Quality Control System", p. 38. | Lecture with audio visual aids |
| C. QC Manual<br>1. Scope and objectives<br>2. Review Process<br>3. Reporting and Sampling<br>4. Corrective Action | Quality Control Manual, DHEW/SRS (revised), September, 1973. | Lecture and group discussion |

| TOPIC | RESOURCE MATERIALS | METHODOLOGY |
|---|---|---|
| D. Introduction to the State QC Review Process | | |
| 1. Documents<br>a. QC Worksheet (Form 341A)<br>b. QC Schedule (Form 341B) | Quality Control Manual: Instructions for completion of the Worksheet and Schedule; copies of Worksheet and Schedule; Eligibility Review Training Program, New York State Department of Social Services, II. "Your Job", Frames 28, 29. | Demonstration and discussion<br>Audio visual aids |
| 2. Elements | Quality Control Manual: Review Process. | Lecture and discussion using worksheet as guide |
| 3. Eligibility Requirements | A State manual from a particular State within the Region. | In-depth discussion using appropriate State manual and the guide developed by the Region for that State |
| | Eligibility Review Training Program, New York State Department of Social Service, III. "Aid to Dependent Children" and V. "Standards of Assistance." | Audio visual aids |

| TOPIC | RESOURCE MATERIALS | METHODOLOGY |
|---|---|---|
| 4. Verifications | Training for Federal Quality Control Review, Section VII, pp. 59-80. | Lecture and discussion |
| E. Application of review theory | Training for Federal Quality Control Review, Section IX, pp. 93-135; Appendix E, "Instructor's Aid for Jane Smith Doe Case"; Training for Federal Quality Control Review, Appendix C, pp. 161-167. | Review, analysis and discussion of cases<br><br>Practicum exercise to be completed by trainee |

# IV. SUMMATION OF STATE QUALITY CONTROL REVIEW PROCESS AND INTRODUCTION TO FEDERAL MONITORING



TRAINING OBJECTIVE

To reinforce the trainee's knowledge of Federal monitoring as it relates to the State QC system.

| TOPIC | RESOURCE MATERIALS | METHODOLOGY |
|---|---|---|
| IV. SUMMATION OF THE STATE QC REVIEW PROCESS AND INTRODUCTION TO FEDERAL MONITORING | Training for Federal Quality Control Review, Section V, pp. 41-43; transparency, "State Quality Control Review Process", p. 43; Section I, p. 11. | Discussion and visual aid<br><br>Discussion of five basic steps |
| | Federal Monitoring Guide, transparency, "Re-review Processing Flowchart", Exhibit V, p. V-6. | Discussion and visual aid |

| TOPIC | RESOURCE MATERIALS | METHODOLOGY |
|---|---|---|
| B. Federal Re-review Monitoring<br><br>1. Roles and functions<br><br>a. ARC<br><br>b. Regional Coordinator<br><br>c. Research Analyst<br><br>d. Training Specialist<br><br>e. Monitor<br><br>f. Reviewer | Training for Federal Quality Control Review, Section VI, pp. 47-56; Federal Quality Control Monitoring Guide, transparencies: (1) "Illustrative Regional Monitoring Organization", p. II-7; (2) "Re-review Processing Flowchart", p. V-6; Appendix F, "Outline for Field Reviewers." | Lecture and discussion of transparencies and related material |

| TOPIC | RESOURCE MATERIALS | METHODOLOGY |
|---|---|---|
| 2. Process | | |
| a. Sample selection | Federal Quality Control Monitoring Guide, Section VI, pp. 1-6. | Lecture and discussion |
| (1) Re-review sample | | |
| (2) Non-sample cases | | |
| b. Initial Desk Review | Federal Quality Control Monitoring Guide, Section V, p. 3. | Lecture and discussion, including "walk through" of desk review process |
| c. Field Review | | |
| (1) Eligibility Requirements | Appropriate State Manual; Training for Federal Quality Control Review, Section IX, pp. 93-94 adapted to particular State; Quality Control Manual, "Elements of Eligibility"; Eligibility Review Training Program, New York State Department of Social Services, II. "Your Job", Frames 36 and 37; V. "Standards of Assistance." | Review of selected portions of appropriate State manual previously covered in section III. D. 3 of this document<br><br>Discussion and audio visual aids |

| TOPIC | RESOURCE MATERIALS | METHODOLOGY |
|---|---|---|
| (2) Federal Monitoring Schedule | Federal Quality Control Monitoring Guide, Appendix F, pp. 1-8. | Demonstration of how to use and complete form |
| (3) Verifications | Training for Federal Quality Control Review, Section VI, pp. 47-56. | Review of previously discussed material |
| (4) Interviewing | Training for Federal Quality Control Review, Section VIII, pp. 83-89; Appendix G, "Instructor's Notes on Interviewing"; Eligibility Review Training Program, New York State Department of Social Services, VIII. "The Interview." | Lecture with group participation and "Semantics Barometer" exercise<br><br>Audio visual aid and role playing |
| d. Final Desk Review | Federal Quality Control Monitoring Guide, Section V, p. 4. | Lecture and discussion, including "walk through" of Final Desk Review |

| TOPIC | RESOURCE MATERIALS | METHODOLOGY |
|---|---|---|
| e. Disposition and Resolution of Findings | Federal Quality Control Monitoring Guide, Section V, pp. 4-5. | Lecture |
| f. Reporting | Federal Quality Control Monitoring Guide, Section VIII, pp. 1-2. | Lecture summarizing "Quality Control Reports" |

## APPENDIX A

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
SOCIAL AND REHABILITATION SERVICE
WASHINGTON, D. C. 20201

SRS PROGRAM REGULATION 10-11(C-6)
April 6, 1973

TO: STATE ADMINISTRATORS AND OTHER INTERESTED ORGANIZATIONS AND AGENCIES

SUBJECT: Improvement in the Quality Control System and Reduction of Error in Payments

CONTENT: The regulations revise the requirements for State Quality Control Systems, (45 CFR 205.40); add a new section 205.41 which provides for disallowance of Federal funds beginning January 1, 1974, and phased-in over an 18-month period; and revises 45 CFR 233.10 to make clear that State plan provisions are, in some instances, prerequisite to Federal financial participation.

EFFECTIVE DATE: April 6, 1973

BACKGROUND: The proposed regulation, as published in the Federal Register on December 5, 1972, on this subject, was transmitted to you by Information Memorandum AO-IM-73-12 dated December 5, 1972.

PLAN MATERIAL: States whose plans do not comply with this regulation must submit amendments no later than 60 days after publication in the Federal Register.

INQUIRIES TO: SRS Regional Commissioners.

James D. DeGeus
Acting Administrator

Title 45—Public Welfare

CHAPTER II—SOCIAL AND REHABILITATION SERVICE (ASSISTANCE PROGRAMS), DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

PART 205—GENERAL ADMINISTRATION—PUBLIC ASSISTANCE PROGRAMS

PART 233—COVERAGE AND CONDITIONS OF ELIGIBILITY IN FINANCIAL ASSISTANCE PROGRAMS

## Improvements in Quality Control System and Reduction of Payment Error

Notice of proposed rulemaking for the programs administered under titles I, IV-A, X, XIV, XVI, and XIX of the Social Security Act was published on December 5, 1972 (37 FR 25853), the regulation to become effective January 1, 1973. Subsequently, the time for making comments on the proposal was extended, and the effective date of January 1, 1973, was deleted with the statement that regulations would become effective no later than April 1, 1973, and that the additional time would "enable staff of the Department to consult with State public assistance agencies and other interested persons regarding the proposed regulations and other related regulations of the Department, with the objective of seeking the best means of assuring the validity of assistance payments." (37 FR 27636, Dec. 19, 1972.)

Numerous comments on the December 5 proposal were received, and extensive discussions were held with concerned groups and individuals. In light of the comments and suggestions received, the proposed regulations of December 5 have been amended as set forth below, and, as so amended, are herewith adopted.

As originally proposed, the regulations would have excluded from Federal financial participation, as of January 1, 1973, all expenditures for payments for ineligible cases and overpayments for eligible cases in the programs of financial and medical assistance under titles I, IV-A, X, XIV, XVI, and XIX of the Social Security Act. As amended, the regulations provide for increased efforts to improve the structure of the quality control system established by 45 CFR 205.40, accurately determine rates of error, and take corrective action to reduce the level of erroneous payments in the AFDC program in manageable stages.

Specifically, the regulations amend § 205.40 and add a new § 205.41 to part 205 of title 45 to provide for more comprehensive quality control plans to assure more reliable identification and elimination of the causes of erroneous payments, and to establish reasonable targets for eliminating error which States are expected to achieve commencing January 1, 1974. In preparation for the more vigorous program of corrective action, it is anticipated that States will compile accurate data for the period April 1, 1973, to September 30, 1973, establishing the incidence of and costs associated with assistance provided to ineligible cases and overpayments to eligible cases. The data for this period will provide a standard against which subsequent State activity to reduce error will be measured. The rate of Federal financial participation in State expenditures will correlate with the extent to which States meet their individualized goals, with a view to achieving, by the 6-month period beginning January 1, 1975, interim national tolerance levels of 3 percent on assistance to ineligibles and 5 percent on overpayments to eligibles, and will subsequently depend on reduction of error below such levels.

State programs (except those of Guam, Puerto Rico, and the Virgin Islands) under titles I, X, XIV, and XVI of the act are to be removed from the quality control system established by § 205.40, and will not be subject to the corrective action and error reduction goals of the revised regulation. The programs created by those titles are repealed, effective January 1, 1974, by Public Law 92-603, 86 Stat. 1329 (1972), to be replaced by a Federal program of supplemental security income for the aged, blind and disabled. It was concluded that the revised quality control and error reduction program would take effect too late to have significant impact on the superseded programs and that the process of converting those programs from State to Federal administration would itself result in the identification of significant numbers of erroneous eligibility and payment determinations.

Also published and adopted herewith is a technical, conforming amendment to § 233.10(b)(1) to make clear that Federal financial participation is available only in State payments made in accordance with approved State plan conditions prescribing standards of eligibility. Formerly, no question regarding the propriety of Federal financial participation was raised concerning State payments made to individuals ineligible under State standards but who would have been eligible if the State standards were as broad as permitted by the Federal statute. In view of the revised approach toward corrective action based on information produced by the quality control system, the State plan itself is the appropriate basis for determining Federal financial participation, as it promotes sounder and more consistent administration of State plans.

In addition to comments and suggestions on the quality control and error reduction program proposed on December 5, and adopted herewith as revised, many comments were received on regulations of the Department which are related to methods of determining eligibility and the amount of assistance, fair hearings, and overpayments to individuals. Proposed revisions responsive to those comments will be published in the FEDERAL REGISTER in the near future.

8. Structure the interview so that it is non-threatening.

9. Evaluate the client's attitude and proceed accordingly.

10. Be observant of the home and surroundings.

11. Listen carefully.

12. Do not attempt to conduct the interview in a language other than English unless you are fluent in the language of the interviewee and feel secure enough to handle the situation.

Confidentiality

1. Arrange for privacy during the interview. Let the client know that the interview may cover highly confidential material and that it would be desirable to talk to her alone.

2. Honor the client's request to have a resource person if he or she so desires.

3. Assure the client of confidentiality.

4. Qualify and explain this confidentiality.

Miscellaneous

1. Use common sense.

2. Know where you are--the community, the neighborhood.

APPENDIX C

# FEDERAL REGULATIONS IN PUBLIC ASSISTANCE

Mildred Hoadley
Director, Division of Program Payment Standards
Assistance Payments Administration

## I. Federal Policies

Federal policies are based on various provisions in the Federal law, the legislative history such as that found in Committee reports that further specify Congressional intent, interpretations of the law by the Office of the General Counsel, and by the Courts. Supreme court decisions having a direct effect upon Federal policies are those which interpret the Social Security provisions in the Act and those which pertain to individual rights under the U.S. Constitution.

The Act contains specific provisions with which a State must commit itself to comply in the administration of its program under the various assistance titles in the Act; and conditions under which there will be Federal financial participation in State expenditures.

Federal policies are developed as a response to these provisions: setting forth Federal requirements with which States are to comply when the wording of the law is "a State plan must provide that"; setting forth the framework and definitions which are conditions for Federal matching of State expenditures; and setting forth a variety of procedural and management criteria to establish methods for proper and efficient administration of the program for which the Secretary has legislative authority.

The eligibility requirements specify conditions which must be met for an individual to qualify for the receipt of assistance under the various titles of the Act.

With regard to the Federal eligibility requirements, of particular interest to reviewers in the Quality Control process, some are minimum conditions which must be met; others are broad outer limits which provide States with certain options. For example, under

existing Federal regulations a State plan must provide that the use or disclosure of information concerning applicants and recipients will be limited to purposes directly connected with the administration of the program. (Under proposed regulation implementing P.L. 92-603 there will be a change in policy with regard to the adult categories). On the other hand, States have the option, under specific provisions in the law, to elect whether or not to include in its AFDC program children age 18-21 who are attending school Under Federal interpretation of the Act States have had the freedom of establishing their own definitions as to blindness for the AB program, incapacity of a parent with regard to the AFDC program, and permanent and total disability for the APTD program.

In addition to factors of eligibility which are based on the Social Security Act, some States have imposed additional "State only" eligibility conditions. Some of these have been found by Federal Courts to be either unacceptable under the Social Security Act or under the Constitution; others have been upheld.

While the Federal law generally sets forth broad criteria, there are specific provisions which add to administrative complexities. For example, there are differing income disregards applicable in the various financial assistance programs.

## II. Income Maintenance Function

The income maintenance or assistance functions which provide the framework for Federal policies may be grouped for the Quality Control process to include:

acceptance of applications;

determination of who is eligible for benefits under the programs;

determination as to the amount of the assistance payment;

determination of who is to be the payee to receive the assistance payment;

determination as to the specific kind of assistance for which the persons qualify and to assure that they have the opportunity to exercise choice if eligible under more than one program;

operation of the administrative and fiscal processes related to the prompt issuance of the payment;

accountability for the proper and efficient administration of the program.

III. Policies in Effect

Thus, the staff at the local level is responsible for responsiveness to Federal policies, as reflected in the State's plan, in the following broad areas:

A. Answering inquiries from the public or from potential applicants, and providing information about eligibility provisions, payments, and other aspects of the assistance programs.

B. Accepting applications and determining eligibility for financial and medical assistance. Under provisions of the Act in each of the assistance titles each individual wishing to do so must have the opportunity to apply for assistance without delay and, if eligible, to receive assistance promptly. These provisions in Federal law have led to the policies contained in 45-CFR 206.10 which currently specify a standard for promptness of 30 days for all programs except for APTD which specifies 60 days. A proposed regulation now under consideration would increase this period. These are outside time limits and most States make the eligibility determination in less time.

In order to assure that there is a process whereby the provisions of law can be carried out, it is necessary that individuals have information about the program and how it operates. Thus there are requirements as to notifications and for the agency to act promptly on information it receives. 45-CFR 206.10 (a)(9)(ii) requires that eligibility be reconsidered or redetermined within 30 days of the receipt of a report that an individual may be eligible for payment in a different amount or may be ineligible.

C. Determining (including medical examinations) disability, incapacity, or blindness, where that status is a prerequisite to eligibility for financial or medical assistance.

D. Determining need and the amount of the payment or benefit, taking into account income, resources, employment expenses, and other special considerations.

Income and resources such as real property must be evaluated. Financial support available from other sources needs to be taken into account. Thus, the individual's resources must be compared to the State's assistance standard, to determine the amount of payment or benefit. A determination must be made as to whether resources should be put in liquid form. Inquiry is made about contributions, if any, from absent parents.

E. Making determinations as to payment. In order to provide the assistance to which a person is determined entitled, it is necessary to designate the payee to whom the payment will be issued, to determine the type of payment to be made, and to establish the period of entitlement both retroactively and prospectively when there are factors to affect the continuation of assistance.

The payee will be the applicant, or a protective payee, including possible need for legal representative or guardian, or

under certain instances a vendor payee (as specified in provisions of the Act relative to emergency assistance, AFDC protection and vendor payment provisions, home repairs, and medical vendor payments.)

F. Determining and handling work related eligibility conditions such as:

Receiving information and taking appropriate action when a person found available for work or training has refused to accept such classification.

G. Providing information and notification. There are certain procedural Federal requirements that are specific with regard to financial and medical assistance which have a direct bearing on the person's entitlement under the program and on whether the agency has carried out its responsibility in assuring the correct payment:

1. Notification of acceptance, amount of payment, date assistance will begin, or of denial of application with specific reason under the policies.

2. Advance notice of decision to change or terminate assistance and the proposed effective date.

3. Notification of final decision as to change or termination and effective date.

4. Information as to fair hearings and safeguarding of information.

H. Authorizing and issuing payments. There are procedures essential to the provision of assistance which have to do with the issuance of payments and maintaining proper fiscal operations and control for accountability.

I. Assuring proper and efficient administration through use of management and program techniques, staff training, etc.

J. Providing for maintenance of records, reports, statistical data and other kinds of program review techniques.

K. Providing for consumer protections through fair hearings, safeguarding information, public information issuances, etc.

IV. Process of Policy Formulation

As stated in the beginning, the enactment of a Federal law initiates the development of Federal policies; or subsequent interpretations may modify or change existing policies so long as they are legally permissible under existing laws.

Specific policy proposals are considered by SRS and recommendations, usually with a statement of background and options, are submitted to the Secretary where the decision as to proposed policy is made.

New proposed regulations are published in the Federal Register under the rule making process. A thirty day period is generally provided to the public for comment on the proposals. The responses are then reviewed, analyzed, and a statement concerning them is incorporated in the submittal to the Secretary of a recommendation for a final regulation.

After approval by the Secretary, the final regulation is published in the Federal Register and issued as Federal policy with an effective date after which States are held responsible.

## APPENDIX D

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
SOCIAL AND REHABILITATION SERVICE
WASHINGTON, D.C. 20201

PROGRAM INSTRUCTION
APA-PI-71-5
MSA-PI-71-1
February 12, 1971

TO: STATE AGENCIES ADMINISTERING PUBLIC ASSISTANCE AND MEDICAL ASSISTANCE PROGRAMS

SUBJECT: State plan amendment - Fair hearings

CONTENT: Enclosed is a preprinted statement for use in amending State plans to meet the requirements of SRS Program Regulation 10-2(C-3 ), dated February 13, 1971 (45 CFR 205.10), Fair hearings.

The statement should be submitted to the SRS Regional Commissioner in the usual manner.

INQUIRIES TO: SRS Regional Commissioners

Commissioner, Assistance Payments Administration

Howard Newman
Commissioner, Medical Services Administration

STATE PLAN FOR
TITLE ☐ I, ☐ IV-A, ☐ X, ☐ XIV, ☐ XVI, ☐ XIX
OF THE SOCIAL SECURITY ACT

STATE OF _____

Plan Amendment: Fair Hearings, 45 CFR 205.10; SRS Program Regulation 10-2(C-2), February 11, 1971

Effective _____, with respect to the program administered under this State plan, the State will have a system of fair hearings in accordance with the requirements of 45 CFR 205.10, under which:

1. The single State agency responsible for the program will be responsible for the fulfillment of fair hearingsprovisions.

2. Every claimant will be informed in writing, at the time of application and at the time of any action affecting his claim, of his right to a fair hearing, the method for obtaining it, his right to representation by others or to represent himself, and any agency provisions for payment of legal fees.

3. An opportunity for a fair hearing before the State agency will be granted to any individual requesting it because his claim for assistance is denied, or not acted upon with reasonable promptness, or because he is aggrieved by any other agency action affecting receipt, suspension, reduction or termination of such assistance or by agency policy as it affects his situation.

4. Hearing procedures will be issued and publicized by the State agency for the guidance of all concerned.

5. In cases of proposed action to terminate, suspend or reduce assistance:

   a. The State or local agency will give timely and adequate advance notice detailing the reasons for the proposed action; this advance notice period is _____ days;

   b. Opportunity to the individual (or his representative) for conference with agency staff, concerning the proposed action and including opportunity to present information to show that it is incorrect, will be provided during the advance notice period, if the individual so requests within such period;

   c. If there is a request for a fair hearing within the State's advance notice period, assistance will be continued until the fair hearing decision is rendered and through a period con-

sistent with the State's established policies for issuance of payments unless a determination is made by the State agency, in accordance with criteria issued by the Social and Rehabilitation Service, that the issue is one of State agency policy and not one of fact or judgment relating to the individual case, including a question of whether the State agency rules or policies were correctly applied to the facts of the particular case, and the agency will promptly inform the claimant in writing if assistance will be discontinued, based on the State agency's determination.

d. If there is a request for a fair hearing within the State's advance notice period, assistance will also be continued in all cases even when the issue is not one of fact or judgment;

☐ Yes ☐ No

e. The State will also reinstate and continue assistance until the fair hearing decision if a request for a fair hearing is made within a period of ____ days after the expiration of the advance notice period.

☐ Yes ☐ No

6. Information and referral services will be provided to help claimants make use of legal services available in the community that can provide legal representation at the hearing.

7. The hearing will be conducted at a time, date and place convenient to the claimant, and adequate preliminary written notice will be given.

8. The hearings will be conducted by an impartial official (or officials) of the State agency.

9. When the hearing involves medical issues, a medical assessment other than that of the person(s) involved in making the original decision will be obtained at agency expense from a source satisfactory to the claimant and made part of the record, if the hearing officer or the appellant considers it necessary.

10. The claimant or his representative will have adequate opportunity to examine all documents and records used at the hearing, at a reasonable time before the date of the hearing and during the hearing, to present his case himself or with the aid of others, to bring witnesses, to establish all pertinent facts and circumstances, to advance arguments without undue interference, and to question or refute any testimony or evidence, including opportunity to confront and cross-examine adverse witnesses.

11. Prompt, definitive and final administrative action will be taken within 60 days from the date of the request for the hearing, unless the claimant requests a delay in the hearing.

12. The claimant will be notified of the decision, in writing, in the name of the State agency, and, if available, of his right to judicial review.

13. When the hearing decision is favorable to the claimant, or the agency decides in his favor prior to the hearing, the agency will make corrective payment retroactively to the date of the incorrect action or such earlier date as is provided by State policy.

14. Recommendations of the hearing official(s) will be based exclusively on evidence and other material introduced at the hearing and a verbatim transcript of testimony and exhibits or an official report of the substance of the hearing, together with all papers filed in the proceeding, and the recommendations of the hearing official(s) will constitute the exclusive record for decision by the hearing authority. Such record will be available to the claimant or his representative at an accessible place at any reasonable time.

15. Decisions by the hearing authority in the name of the State agency will specify the reasons and identify the supporting evidence, and will be binding on the State and local agency.

16. The State agency will establish and maintain a method for informing all local agencies of all fair hearing decisions, and the decisions will be accessible to the public (subject to provisions for safeguarding information).

17. In respect to the program under title XIX, when the appeal is based on eligibility determination, the agency responsible for such determination, if different from the State agency administering the medical assistance plan, will participate in the conduct of the hearing.

## APPENDIX E

### INSTRUCTOR'S AID FOR JANE SMITH DOE CASE

1. The Jane Smith Doe worksheet has been prepared as an example of an excellent QC review. However, prior to discussing the sample worksheet, the instructor should emphasize that "perfectly" reviewed cases will never be identical; i.e., this review is described as being excellent solely because all eligibility and payment factors presented in the example were, in fact, verified correctly. Alternative verifications might have been chosen, and examples with alternative factors would have required alternative verifications. Therefore, the trainees should clearly understand that actual QC review worksheets cannot be judged properly by simply comparing the worksheets they encounter in the field with this one example.

2. In this example, the client and her three children live alone in a rented home. The client's separated husband and father of all three children lives and works in another community. AFDC deprivation is to be established due to the continued absence of this parent.

   The client owns no property; has never owned any property; does have life insurance; and does have a bank checking account.

   The client is unemployed and has no income other than her assistance grant.

3. The local agency had originally determined payment eligibility in February 1967. The agency redetermined eligibility in February 1973 using the simplified method (i.e., the declaration form). The case has been in a continuing payment status since February 1967.

   The reviewer properly and systematically verified the eligibility and payment factors in each of the seventeen applicable review elements by means of a full field investigation.

The instructor should re-emphasize that the function of the QC reviewer is to test the results of one accepted eligibility determination process (e.g., the simplified method) by employing an alternative eligibility determination process (the full field investigation) and comparing the results.

In the sample the reviewer's worksheet demonstrates that he meticulously followed the requirements of the full field investigation process. He identified those specifics of the client's living arrangements which were material to each element. He identified (by manual quotation) the State requirements which must be met to establish eligibility and compute the grant in each element. And finally he verified by documentation, collateral substantiation or personal observation that the living arrangements did, indeed, meet State requirements.

Consequently, in the example, the reviewer determined that the case was eligible and properly paid.

APPENDIX F

OUTLINE FOR FIELD REVIEWERS

I. Assignment of review responsibility and review documents

   A. Federal Monitoring Schedule - Form OQC-2

   B. Completed State QC Review Schedule and Worksheet

II. Preparation for field contacts

   A. Review monitor's instructions

      1. Specific objectives

      2. Suggested methods

      3. Specific policy consideration

   B. Discuss questions with monitor

   C. Prepare eligibility profile

      1. Household composition

      2. Resources

      3. Income

      4. Need factors subject to change

   D. Become familiar with client's circumstances

   E. Note well the "test duty" of the re-review process

III. Travel plans and appointments

   A. Develop tentative itinerary

   B. Make appointment with client

      1. By letter

      2. By phone - confirm address

      3. In person

IV. The home visit

A. Introduce yourself

B. Explain purpose of visit

1. How re-review differs from State QC

2. The role of the Federal re-review

C. Explain method of re-review

D. Tell client what you expect of him

E. Elicit client's cooperation

V. The re-review interview

A. Permit client to re-state situation

B. Follow leads given by client

C. Focus on monitor's instructions

D. Identify discrepancies from those accepted by State QC

E. Secure client's cooperation and consent to document eligibility factors related to:

1. Monitor's request for information

2. New factors not noted by State QC

VI. Documentation

A. Use documents in client's possession

B. Identify alternative methods if primary documentation is not available

C. Consult with monitor if in doubt

D. Use fastest and most direct method

E. Make collateral contacts as necessary

VII. Preparing the Report (OQC-2, Section I)

A. Report on specific items identified by monitor

B. Report on new information found affecting payment or eligibility

VIII. Completing the Report

A. Turn in completed schedule to monitor for appraisal

B. Follow up on any questions raised by monitor

## APPENDIX G

## INSTRUCTOR'S NOTES ON INTERVIEWING

The following teaching modes have proven helpful in conducting QC Interviewing training:

1. "Didactic" for basic background information.

2. "Immediate group involvement" to encourage students to question one another's statements and reactions through the use of peer checks and balances.

3. Visual presentation of the interviewing materials to be discussed. In addition, a condensed version of the outline of these materials is distributed to the trainees in their conference package prior to the training session.

4. In the topical areas of semantics and use of words, there is an effective exercise involving 5 trainees in which a variation of the "Social Barometer" called a "Word Barometer" is used as a catalyst for group participation and group involvement. The "Word Barometer" utilizes contemporary terms such as Welfare, Quality Control, Women's Liberation. The terms are presented to the five individuals standing before the "barometer". The five persons rate their immediate personal reactions to the words based on a scale of:

| | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| -10 | -8 | -6 | -4 | -2 | 0 | +2 | +4 | +6 | +8 | +10 |

As a word is announced, each person positions himself in front of one of the numbers previously posted on the wall and then in one sentence, describes the reason for his rating. By using popular words of the day, which have differing meanings and evoke strong personal reaction, the group is helped to understand that the listener screens out meanings of the spoken word that relate to his own personality and background. As a result, meanings may be changed or misinterpreted. In turn, the point is made that QC reviewers must use understandable vocabulary and attempt to understand the culture and the environment from which the interviewee comes.

5. We have found such films as "Interviewing in AFDC" an effective visual aid in training for interviewing skills. Although the scene takes place in an agency office between a worker and an AFDC mother, the dynamics of client movement and attitudinal change is dramatically shown through the ongoing outward verbalization of exchange between the worker and the client and the subjective (verbalized) thought-voices of the two participants. The learning experience with the film remains a moving one for even experienced staff because of the sensitive and helpful exchange between worker and client. In addition, the State of New York has developed a series of sound/slides to be used for interviewing training. The State has found the slides an invaluable instructor's supplement.

6. The following time schedule is suggested for designing a condensed training session on interviewing skills.

   a. Presentation of basic materials with group discussion — 1½ hour

   b. Semantics Barometer (group game and participation) — ½ hour

   c. Movie on interviewing skills including brief group discussion — 1 hour

   d. Role playing — 1½ hour

   Role playing gives trainees an opportunity to act out the reviewer's role and experience the need for client involvement in the QC interview process.

7. Whatever methods are utilized, a common focus should be in evidence. There needs to be as much personalization of the total group learning experience as possible so that creative thinking may be stimulated, personal involvement increased, and the "academic" aspects of the presented material are more internalized.

   The instructor must of necessity interweave content, group discussion and group participation with minimum participation of the instructor and maximum involvement of the trainee. The major goal of the effort is to enhance the communication skills of a new staff person. Through the practical experience of group interaction and communication demonstration a keener sense of self-understanding should evolve.

Suggested Bibliography

Interviewing Skills


1. Bernd, Siegfried M. "Do You Know What Your Personality Does to Others?" Business Management, Volume 22, #3, June, 1962, pp. 56-60.

2. Garrett, Annette. Interviewing, Its Principles and Methods. Family Service Association of America, 1942.

3. Houk, Mary. "Interviewing in Public Assistance." Indiana University, Division of Social Services - Article prepared for use by California State Department of Social Welfare, 1965.

4. "Interviewing Techniques." Mental Hygiene, Volume 49, #1, January, 1965.

5. Weshell, Wesley. "Do They Understand You?" Oral Communication, New York McMillen & Company, 1960.

6. Wilson Howard. Speaking, Listening, & Writing. Chicago Administrative Research Associates, 1960.

7. Communications. Chicago Administrative Research Associates, 1960.

8. Self-Development Aid for Supervisor and Middle Manager. Library #34, U. S. Civil Service Commission , 1970.

9. Guide for Training QC Reviewers (Draft), DHEW, APA, January, 1973.


NOTE:

In addition, there are numerous articles and books published by the AMA (American Management Association) dealing with varying aspects of Interviewing and the factors involved in effective communications.

APPENDIX H

SUPPLEMENTAL TRAINING SUGGESTIONS
FOR REGIONAL INSTRUCTORS

The new QC reviewer will have a basic orientation to the QC system as well as some training in the QC review process and interviewing techniques. Verification sources and guidelines have been discussed in the training course and the new QC reviewer will have completed at least one practice exercise case. To supplement this basic training, regional training personnel may want to consider some of the following follow-up training activities:

1. The monitor and regional training instructor may want to cover the monitoring operational procedures for the States to which the review is assigned. Topics to be covered could include: assignment of review schedules, communications, time periods assigned to field and regional office, State and local offices liaison personnel, transporation, verification forms, verification resources, expense vouchers, etc.

2. Training for Federal Quality Control Review illustrates a method of setting up State plan requirements and manual references for review purposes. The new reviewer could be assigned this task or the plan could be developed for him. The first option has the advantage of giving the new reviewer actual experience in the State eligibility manual for the State to which the review is assigned. The new reviewer's work can be checked against the monitor's master copy to evaluate the reviewer's understanding of the plan and manual organization.

3. The new reviewer should be trained in the verification forms to be used in the review process. This would include instruction to complete required identifying information and the procedure for processing the forms.

4. In training for case record content, instructors should consider the use of actual case records from the State to which the review is assigned.

5. Instructors may want to consider the use of field trips to sources of verifications. This might include trips to Court House, Assessor's Office, Bureau of Employment Security, WIN Agency, Social Security District Office, etc.

6. The instructor and monitor should, when possible, utilize schedules and worksheets from the State to which the review is assigned in the training process. This will provide the reviewer with a fuller understanding of the review process in which he is engaged and give insight into the problems in the State review process.

7. The regional instructor should orient the new reviewer to the organizational structure of the regional office. The role of regional QC staff should be covered in detail. Included would be the responsibilities of each person in the QC Unit and the necessity for the QC Unit to function as a team.

8. As part of the training process, the new reviewer should participate in actual field review of QC cases. At first his role will be that of an observer studying the style and methodology of the experienced worker As the new reviewer gains experience, his role may be expanded to the point at which he conducts part or all of the field visit process. These field reviews may be with Federal or State QC personnel.

GPO 870-121